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*Attorneys for Ernst & Young LLP*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

STEPHANIE SUTHERLAND, on behalf of  
herself and all others similarly situated,

Plaintiff,

v.

ERNST & YOUNG LLP,

Defendant.

Civ. Action No. 10-CV-3332 (KMW)

**DECLARATION OF DEA REECE**

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I, Dea Reece, certify and declare as follows: I am over eighteen years of age and have personal knowledge of the facts set forth in this declaration and would testify competently to them under oath if called as a witness.

1. I am employed by Ernst & Young LLP ("Ernst & Young") in the position of People Consultant for employees in the Financial Services Office Assurance Practice in the Banking Capital Markets segment. I have been a People Consultant for eleven years.
2. As part of my regular job duties, I regularly use databases that contain employee information such as start dates and termination dates. I also regularly access employees' personnel files.
3. In my position, I am also familiar with the offer letters that are sent to staff to whom Ernst & Young extends offers of employment. The offer letters are ordinarily accompanied by various other documents, including a Confidentiality Agreement and Ernst & Young's Common Ground Dispute Resolution Program (the "Program").
4. According to Ernst & Young's records, Stephanie Sutherland commenced her employment as a staff at Ernst & Young on September 17, 2008. Ernst & Young terminated her employment effective December 8, 2009.
5. Attached as Exhibit A is a true and correct copy of the offer letter that Ernst & Young sent to Ms. Sutherland, which is located in Ms. Sutherland's personnel file.
6. Attached as Exhibit B is a true and correct copy of the Confidentiality Agreement executed by Ms. Sutherland, which is located in her personnel file.
7. Attached as Exhibit C is a true and correct copy of the version of the Program (AA7521) that is referenced in Ms. Sutherland's Confidentiality Agreement.

8. Attached as Exhibit D is a true and correct copy of the version of the Program (AA7523) that became effective on July 18, 2007.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on August 19, 2010, at New York, New York.

  
Dea Reece